

EXHIBIT H

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE GOOGLE PLAY STORE Case No. _____

ANTITRUST LITIGATION 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC, et al.,

Case No: 3:20-cv-05671-JD

In re Google Play Consumer

Antitrust Litigation

Case No: 3:20-cv-05761-JD

In re Google Play Developer

Litigation.

Case No: 3:20-cv-05792-JD

State of Utah et al. v.

Google LLC, et al.

Case No: 3:21-cv-05227-TD

HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED

DEPOSITION OF LAWRENCE KOH

Thursday December 8 2021

Remotely Testifying from San Francisco, California

Reported By:

Hanna Kim CLB CSB No 13083

Job No. 4969626

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1 expressed discontent over play rev share; right?

2 A. That is correct, on this slide.

3 Q. And the -- the next bullet, so to speak,
4 is talking about the risks that the Project Hug
5 developers "may forgo Play."

6 Do you see that?

7 MR. BRADSHAW: Object to the form.

8 THE WITNESS: Yes. Yes.

9 BY MS. MOSKOWITZ:

10 Q. Including on -- on the third bullet there
11 it says that all of these Project Hug developers
12 had capabilities to, quote, "go-it-alone on
13 Android"; right?

14 MR. BRADSHAW: Object to the form.

15 THE WITNESS: That is correct.

16 BY MS. MOSKOWITZ:

17 Q. Meaning these were large enough and
18 established enough major developers that they
19 could, in fact, come up with the infrastructure
20 needed to actually establish and launch their own
21 app store on Android; right?

22 A. That is correct.

23 Q. If you could turn next to '2839.

24 A. Yes, I'm here.

25 Q. Great.

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1 Q. The Project Hug developers were all
2 considered agitators?

3 A. They were considered potential agitators.

4 Q. And some of the Project Hug developers
5 specifically told Google that they were
6 considering starting their own competing Android
7 app stores; right?

8 A. That is correct.

9 Q. Riot was one of those?

10 A. That is correct.

11 Q. Can you name all of the other Project Hug
12 developers that you can recall that told Google
13 that they were considering starting their own
14 competing Android app stores?

15 A. Riot and Activision Blizzard King were the
16 ones that were the most direct with us. All the
17 other ones were just more of us internally
18 speculating who could potentially have the
19 capabilities to build out an infrastructure to
20 distribute gaming content.

21 Q. Okay. All right.

22 I'm going to mark one other -- not one
23 other, the next -- sorry, I don't want to promise
24 that that's my last document.

25 If you could can go into the Exhibit